

UNITED STATES DISTRICT COURT OF MASSACHUSETTS
BOSTON DIVISION

GIBSON FOUNDATION, INC.,)	
A DELAWARE CORPORATION,)	
)	
Plaintiff,)	Case No. 1:20-CV-10682-IT
)	
vs.)	
)	
ROB NORRIS D/B/A THE PIANO MILL, A)	
CITIZEN OF MASSACHUSETTS; THE)	
PIANO MILL GROUP, LLC)	
)	
Defendants.)	

GIBSON FOUNDATION'S PROPOSED VERDICT FORMS

Dated: June 14, 2024

BATES & BATES, LLC

By: /s/Andrea E Bates

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GIBSON FOUNDATION, INC.

JURY CHARGE

In the course of your deliberations, you are to answer the following questions. You are to answer each and every question, unless otherwise directed:

Question No. 1 Bailment:

[The law relating to this question is explained to you in Instruction No. 15.]

Do you find Piano Mill failed to comply with a bailment agreement by not returning the Liberace Piano when the Gibson Foundation demanded the return?

Answer yes or no:

Answer: Yes or No _____

Proceed to Question 2.

Question No. 2 Contract:

[The law relating to this question is explained to you in Instruction No. 17.]

Do you find that Piano Mill failed to comply with a contract between the parties that resulted in the proximate harm to Gibson Foundation?

Answer: Yes or No _____

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF electronic filing system on June 14, 2024.

/s/ Andrea E. Bates
Andrea E. Bates